

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

LARRY D. REID and LARRY REID LIVE,
LLC,

Plaintiffs,

v.

LAVONTRAYE ANDREWS,

Defendant.

MOTION FOR DEFAULT JUDGMENT

Civil Action No.: 1:23-cv-705

Pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and Rule 7.3 of the Rules of Practice and Procedure of the United States District Court for the Middle District of North Carolina (“LCvR”), Plaintiffs Larry D. Reid and Larry Reid Live, LLC (“Plaintiffs”) move for an entry of default judgment against Defendant Lavontraye Andrews (“Mr. Andrews”) as to Plaintiffs’ First Cause of Action, Defamation and Slander *per se*.

This motion is based upon the following grounds:

1. Mr. Andrews has failed to plead in response to Plaintiffs’ Complaint [DE #1] or is otherwise subject to default judgment as provided by the Federal Rules of Civil Procedure.
2. On September 25, 2023, default was entered against Mr. Andrews by the clerk. [DE #10].
3. Plaintiffs are entitled to judgment by default pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure.
4. The well-pleaded facts of the Complaint, as admitted by Mr. Andrews, establish that Mr. Andrews is liable to Plaintiffs for defamation and slander *per se*.
5. Plaintiffs are entitled to an award of nominal damages and seek an award of

nominal damages in the amount of \$1000.00.

6. This motion is supported by the pleadings in this matter and by Plaintiffs' Memorandum of Law in Support of Motion for Default Judgment. Pursuant to LCvR 7.3(a), Plaintiffs will be contemporaneously filing their Memorandum of Law in Support of Motion for Default Judgment.

CONCLUSION

For these reasons and the reasons set forth in the Memorandum of Law in Support of Motion for Default Judgment, Plaintiffs request that this Court grant this Motion and enter judgment against the Defendant in the amount of \$1000.00.

This 7th day of November, 2023.

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CERTIFICATE OF SERVICE

Civil Action No.: 1:23-cv-705

I hereby certify that I have this day electronically filed the foregoing **Motion for Default Judgment** with the Clerk of the Court using the CM/ECF system, and served Plaintiff by sending a true and correct copy via Federal Express Overnight Delivery, Signature Required to:

Lavontraye Andrews
4848 Stovall Dr.
Winston Salem, NC 27101

This 7th day of November, 2023.

TAYLOR ENGLISH DUMA LLP

/s/ Amanda G. Hyland

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